

MEMORANDUM

To: The State EPA Information Management Workgroup
From: Facility Identification Action Team co-chairs
Date: July 19, 1999
RE: The Proposed Facility Identification Data Standard

With this memorandum the Facility Identification Action Team transmits to the State EPA Information Management Workgroup (the Workgroup), the *Proposed Facility Identification Data Standard*. In addition to the standard itself (see attached), this memorandum communicates the Action Team's findings and recommendations about the standard, and its use in the context of the State-EPA data relationship.

These findings and recommendations are identical to those reviewed in the *Facility Identification Action Team Workgroup Decision Memo*, also forwarded to the Workgroup under separate cover.

The Action Team Product: Proposed Facility Identification Data Standard

The standard itself is very simple, it describes the data elements used to uniquely identify a facility site and differentiate it from other facility sites. The standard contains an introduction which provides context to its application, and defines several groups of data elements by listing their name, definition and format. The standard also describes the relationship of these groups to the main Facility Site group. The groups are:

- Facility Site
- Geographic Coordinates
- Mailing Address
- Affiliation
- Organization
- Individual
- Environmental Interest
- Standard Industrial Classification [incorporated by reference]
- North American Industry Classification System [incorporated by reference]

The Action Team held extensive, substantive discussion and debates on most of these groups and their data elements. The final proposed standard represents a significant evolution from the Action Team's starting point. Elements were added, deleted and re-defined at the suggestion of State and EPA Action Team members. There is a general sense that this standard is as good as current knowledge and experience can make it, and that it is an excellent start. All participants expect the standard to be revised over time as EPA and States gain experience using the standard and exchanging data.

Findings

The standard in the context of the State-EPA data relationship

Expert staff from States and EPA have labored over this proposal and believe it to be sound. The Action Team's deliberations included policy and implementation issues of the standard and of how EPA and or States would pursue facility identification. Because many of these issues had never been engaged from a joint State-EPA perspective, they were an appropriate and consistent element of Action Team deliberations. As the standard itself solidified, the Action Team began to re-engage these issues and forge the resolutions contained in the standard's introduction. The language used in the standard itself (shown in italics below) is necessarily terse. Therefore these resolutions are highlighted and elaborated on below, they are:

1) *The standard provides guidance to those developing systems to manage facility data and to data trading partners who wish to exchange facility identification information.* In the context of the State EPA data relationship, the standard's most important use will be in supporting the coordination and exchange of facility identification data where States and EPA have agreed to do so.

2) *The standard does not establish new or modify existing data collections or reporting requirements.* EPA and States are mutually obligated by a complex web of data agreements, requirements, and historical *de facto* standards. These obligations are embodied in statutes, regulations, delegation agreements, and other individual State-EPA agreements. The standard itself does not change these.

EPA and States do aspire, through efforts of the Workgroup, to rationalize their mutual data flows by developing standards (beyond facility identification) for environmental data that each agree to use. The Data Standards Strategy Action Team is recommending a broader strategy for the joint development and use of data standards.

3) *The standard is not intended to represent a minimum nor a maximum set of data that an agency should collect, manage or exchange to meet its facility identification business needs.* States and EPA have, or are developing, facility identification processes. These are supported by agency systems, collections and data standards. In many instances the data elements of the standard exceed what is needed for a given collection or exchange; in others, they are only a start.

4) (As a corollary to #2 and #3) *The standard does not prescribe individual elements as "mandatory" or "optional". The standard allows trading partners and data managers to establish rules about the specific elements they need to manage, as their business needs dictate. It also avoids any confusion that might result from elements prescribed as "mandatory" being interpreted by others as establishing or modifying a data collection or reporting requirement.*

Recommendations

The Action Team recommends the Workgroup take the following actions:

1. Accept the facility standard forwarded by the Action Team.
2. Forward the standard to the appropriate body for States and EPA endorsement.

3. Actively encourage and monitor use of the standard in evolving State and EPA data flows.

We look forward to presenting and discussing these recommendations with you later this month.

Acknowledgment

The chairs would also like to take this opportunity to thank the Action Team members for their tireless participation in what proved to be a difficult, long but ultimately successful joint endeavor. We hope this success is a harbinger of future joint successes in use of the standard itself, and ultimately in improving data we use to protect and preserve our environment.

[signed] Lynn Singleton, Washington, DOE William A. Sonntag, USEPA

State-EPA Information Management Workgroup
Facility Identification Action Team, Co-Chairs

**State-EPA Information Management Workgroup
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